

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	NO.: 4:21-CR-00122
	:	
vs.	:	
	:	(Judge Brann)
MAURICE LAVELLE WHYTE,	:	
Defendant	:	

**REQUEST FOR EXCULPATORY EVIDENCE**

AND NOW, comes the Defendant, Maurice L. Whyte, by and through his counsel, Robert A. Hoffa, Esquire, and respectfully requests this Honorable Court, pursuant to Brady v. Maryland, and its progeny, order the Government to provide all exculpatory evidence within its knowledge or possession or custody or control or which would come within its knowledge, possession, custody or control with the exercise of due diligence. Specifically, the Defendant requests the Court to order the disclosure of the following:

1. Any witness statements favorable to the Defendant;
2. The existence of witnesses favorable to the Defendant;
3. Negative exculpatory statements, such as statements by informed witnesses that failed to mention the Defendant or any eyewitness's inability to identify the Defendant;
4. Test results that do not implicate the Defendant;
5. Any information tending to cast doubt on a witness's credibility. Such evidence may include (a) material lies; (b) prior inconsistent statements of witnesses;

(c) witness hostility; (d) evidence that tends to call into question the capacity of the witness to observe or recall; (e) evidence that is inconsistent with a witness's testimony; (f) any rewards, promises, formal or informal, made to the witness in exchange for his testimony; (g) information concerning prior bad acts of the witness that goes to the witness's credibility; (h) prior criminal convictions of the witness; and (i) any presentence report of the witnesses;

6. A full and complete listing of all previous cases in which the witnesses the Government intends to call in its case in chief have testified on behalf of the Government in the past;

7. Any documentation that would reflect that the Government witness was a target of an investigation and subject to prosecution even if the witness has never been charged with an offense;

8. A summary of any FBI informant file payments made to any witnesses.

WHEREFORE, Defendant, Maurice L. Whyte, respectfully requests this Honorable Court enter an order granting his Brady motion and requiring the Government to disclose the documents sought.

Respectfully submitted,

CAMPANA, HOFFA & MORRONE, P.C.

/S/ Robert A. Hoffa

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